

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

CIVIL ACTION NO. 04 CV 11948 RGS

SEYED MOHSEN HOSSEINI-  
SEDEHY,  
Plaintiff

v.

ERIN WITHINGTON  
Defendant

**DEFENDANT ERIN WITHINGTON'S  
SUPPLEMENTAL PROPOSED VOIR DIRE OF THE JURY**

The Defendant Erin Withington ("Defendant") hereby requests, in this supplemental submission, that this Honorable Court conduct the following *voir dire* of the jury pool. If any juror answers these questions in the affirmative, the Defendant requests that those jurors be individually questioned regarding their impartiality as jurors:

1. Do you have an opinion about whether a male is capable of sexually assaulting another male?

Respectfully submitted,  
DEFENDANT ERIN WITHINGTON  
By her attorney:

/s/ Helen G. Litsas  
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Helen G. Litsas, BBO# 644848  
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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electric Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on February 11, 2007.

/s/ Helen G. Litsas  
Helen G. Litsas